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Attorney for Defendant
LUKE BRUGNARA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Nos. CR 14-00306 WHA

Plaintiff,

BRIEF IN RESPONSE TO COURT
ORDER RE CONTINUED BAIL
HEARING

v.

LUKE BRUGNARA,

Defendant

The court issued an order on August 5, 2014 requiring briefing on the status of hearing on defendant's detention.

At the last hearing, the defendant's wife, Kay Brugnara, did not appear. The government indicated that it was their understanding she may no longer be willing to sign as a surety for her husband. Following the hearing, defense counsel confirmed with Ms. Brugnara that she no longer intended to sign a bond for her husband, given the allegation brought to light by the government about Mr. Brugnara having an affair.

Without Mrs. Brugnara, the undersigned did not have any other potential sureties willing to sign and put up secured property for the defendant.

The government raised an issue about who really owns the home. According to all the title reports, the property is owned by Brugnara VI. In turn, Ms. Brugnara says that she owns the company. The government has insinuated that Mr. Brugnara might own the company. However, as long as both of them sign onto a bond, the bond would be secured, so ownership of the company should not really be an issue.

Counsel has already conferred with Mr. Sprague and will continue to coordinate with him and the court's deputy, then file a stipulation with a proposed hearing date next week.

DATED: August 8, 2014

Brief Re Detention Hearing
United States v. Brugnara, No. CR 14-00306 WHA